

FILED IN OPEN COURT

DATE 9-15-15

BY [Signature]

DEPUTY CLERK

DIVISION, W.D. of VA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

UNITED STATES OF AMERICA

v.

LAURA COOK

Case No. 7:15-CR-00023

STATEMENT OF FACTS

This Statement of Facts briefly summarizes the facts and circumstances surrounding the defendant's, Laura Cook's, criminal conduct at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation.

This Statement of Facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410 and Federal Rule of Criminal Procedure 11.

In February and March 2015, the individual identified in the indictment as MINOR 1 was 17 years old. Ms. Cook was 24 years old until March 23, 2015, when she turned 25. At some point in February 2015, MINOR 1 and Ms. Cook began socializing. Ms. Cook initially believed MINOR 1 was 18 years old, but quickly learned that she was a minor who was attending Salem High School and had a very difficult home situation. Ms. Cook took advantage of MINOR 1's situation. Ms. Cook encouraged MINOR 1 to stay with Ms. Cook, party with Ms. Cook, and do illegal drugs with Ms. Cook.

In February 2015, Ms. Cook introduced MINOR 1 to co-conspirator Terrell Banker via the Internet, specifically FaceBook, a facility and means of and affecting interstate commerce. Mr. Banker provided various illegal drugs to Ms. Cook and others, including marijuana, meth, and cocaine. Ms. Cook asked Mr. Banker to provide MINOR 1 with meth. On at least one occasion Mr. Banker took payment in the form of sex with MINOR 1 after providing MINOR 1 and Ms. Cook with meth.

In March 2015, MINOR 1 ran away from home. Ms. Cook harbored MINOR 1 at her house. On at least two occasions, Ms. Cook told Mr. Banker that MINOR 1 was a 17-year old runaway. Ms. Cook was concerned that she would get in trouble with the law for harboring MINOR 1 and sought assistance from Mr. Banker. On March 24 or 25, 2015, Ms. Cook told Mr. Banker over FaceBook that MINOR 1 couldn't stay at Ms. Cook's home anymore because MINOR 1's guardian had figured out where she was staying.


Mr. Banker has a history of prostituting women. Ms. Cook and Mr. Banker agreed that MINOR 1 should be prostituted as a way of earning money. At the end of March 2015, Mr. Banker arranged, via cellular telephone, a facility and means of and affecting interstate commerce, a prostitution encounter with an individual known to Mr. Banker (the "John"). Mr. Banker informed Ms. Cook of the arrangement on at least March 30, 2015. On March 31, 2015, MINOR 1 was alone at Ms. Cook's house while Ms. Cook was visiting her boyfriend. Mr. Banker solicited, recruited, and enticed MINOR 1 to engage in prostitution activity over the Internet, specifically FaceBook. He transported MINOR 1 to the commercial sex act and took the payment from the "John." MINOR 1 was hungry and had no money or other means to support herself. Therefore, she reluctantly engaged in the commercial sex act, which occurred in the Western District of Virginia. Shortly thereafter, Ms. Cook told Mr. Banker that she expected some of the money be given to her as payment for MINOR 1's "rent."

I have reviewed the above Statement of Facts with my attorney and I agree that it is true and accurate. I agree that had this matter proceeded to trial, the United States would have proven the fact outlined above beyond a reasonable doubt.

Date: September 15, 2015



Laura Cook



Chris Kowalczyk, Esq.
Attorney for Defendant